



BellSouth Telecommunications, Inc.
Suite 2101
333 Commerce Street
Nashville, Tennessee 37201-3300

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March 1, 1999

REC'D TN
OFFICE OF THE
GENERAL COUNSEL
REGULATORY AUTH.

'99 MAR 1 PM 3 47

OFFICE OF THE
EXECUTIVE SECRETARY

VIA HAND DELIVERY

David Waddell, Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37238

Re: *Petition by e.spire Communications, Inc. and American Communication Services of Nashville, Inc. for Arbitration with BellSouth Telecommunications, Inc. Pursuant to the Telecommunications Act of 1996*
Docket No. 98-00834

Dear Mr. Waddell:

Enclosed are the original and thirteen copies of BellSouth Telecommunications, Inc.'s First Interrogatories and First Request for Production of Documents to e.spire Communications, Inc. Copies of the enclosed are being provided to counsel of record for all parties.

Very truly yours,



Guy M. Hicks

GMH:ch
Enclosure

BEFORE THE TENNESSEE REGULATORY AUTHORITY
Nashville, Tennessee

In Re: *Petition by e.spire Communications, Inc. and American Communication Services of Nashville, Inc. for Arbitration with BellSouth Telecommunications, Inc., Pursuant to the Telecommunications Act of 1996*

Docket No. 98-00834

BELLSOUTH TELECOMMUNICATIONS, INC.'S
FIRST REQUEST FOR PRODUCTION OF DOCUMENTS TO
e.spire COMMUNICATIONS, INC.

BellSouth Telecommunications, Inc. ("BellSouth") hereby requests e.spire Communications, Inc. ("e.spire") to furnish documents in response to the following Requests for Production by April 1, 1999.

INSTRUCTIONS

(a) If any response required by way of answer to these Requests for Production is considered to contain confidential or protected information, please furnish this information subject to a protective agreement.

(b) If any document is withheld under a claim of privilege, please furnish a list of each document for which the privilege is claimed, reflecting the name and address of the person who prepared the document, the date the document was prepared, each person who was sent a copy of the document, each person who has viewed or who has had custody of a copy of the document, and a statement of the basis on which the privilege was claimed.

(c) These Requests for Production are to be answered with reference to all information in your possession, custody or control or reasonably available to you. These

Requests for Production are intended to include requests for information that is physically within e.spire's possession, custody or control as well as in the possession, custody or control of e.spire's agents, attorneys, or other third parties from which such documents may be obtained.

(d) If any Request for Production cannot be responded in full, answer to the extent possible and specify the reason for your inability to respond fully. If you object to any part of a Request for Production, answer all parts of the request to which you do not object, and as to each part to which you do object, separately set forth this specific basis for the objection.

(e) These Requests for Production are continuing in nature and require supplemental responses should information unknown to you at the time you serve your responses to these requests subsequently become known or should your initial response be incorrect or untrue.

DEFINITIONS

(a) "e.spire" means e.spire Communications, Inc., American Communication Services of Nashville, Inc., any predecessors in interest, its parent, subsidiaries, and affiliates, their present and former officers, employees, agents, directors, and all other persons acting or purporting to act on behalf of e.spire.

(b) "You" and "your" refer to e.spire.

(c) "Person" means any natural person, corporation, corporate division, partnership, other unincorporated association, trust, government agency, or entity.

(d) "And" and "or" shall be construed both conjunctively and disjunctively, and each shall include the other whenever such construction will serve to bring within the scope of these Interrogatories information that would not otherwise be brought within their scope.

(e) "Identification" or "identify" when used in reference to: (i) a natural individual, requires you to state his or her full name and residential and business address; (ii) a corporation, requires you to state its full corporate name and any names under which it does business, the state of incorporation, and the address of its principal place of business; (iii) a document, requires you to state the number of pages and the nature of the document (e.g., a letter or memorandum), its title, its date, the name or names of its authors and recipients, and its present location or custodian; (iv) a communication, requires you, if any part of the communication was written, to identify the document or documents which refer to or evidence the communication, and to the extent that the communication was not written, to identify the persons participating in the communication and to state the date, manner, place, and substance of the communication.

(f) "Arbitration Petition" refers to the petition filed by e.spire on November 25, 1998 requesting arbitration under Section 252(b) of the Communications Act of 1934, as amended by the Telecommunications Act of 1996 ("Act").

(g) "Incumbent Local Exchange Carrier" refers to the term as defined in Section 252(h) of the Act, as codified in 47 U.S.C. § 252(h).

REQUESTS FOR PRODUCTION

1. Produce copies of all documents identified in response to BellSouth's First Set of Interrogatories.

2. Produce all documents that support or refer or relate to the recurring and nonrecurring rates you contend BellSouth should charge e.spire for an unbundled 2-wire voice-grade loop in Tennessee.

3. Produce all documents that support or refer or relate to the recurring and nonrecurring rates you contend BellSouth should charge e.spire for an unbundled 4-wire voice-grade loop in Tennessee.

4. Produce all documents that support or refer or relate to the recurring and nonrecurring rates you contend BellSouth should charge e.spire for an unbundled 2-wire ISDN digital grade loop in Tennessee.

5. Produce all documents that support or refer or relate to the recurring and nonrecurring rates you contend BellSouth should charge e.spire for an unbundled 2-wire ADSL-compatible loop in Tennessee.

6. Produce all documents that support or refer or relate to the recurring and nonrecurring rates you contend BellSouth should charge e.spire for an unbundled 2-wire HSDL-compatible loop in Tennessee.

7. Produce all documents that support or refer or relate to the recurring and nonrecurring rates you contend BellSouth should charge e.spire for an unbundled 4-wire HDSL-compatible loop in Tennessee.

8. Produce all documents that support or refer or relate to the recurring and nonrecurring rates you contend BellSouth should charge e.spire for an unbundled 4-wire DS-1 digital grade loop in Tennessee.

9. Produce all documents that support or refer or relate to the recurring and nonrecurring rates you contend BellSouth should charge e.spire for an unbundled 4-wire 56/64 kbps digital grade loop in Tennessee.

10. Produce all documents that support or refer or relate to the recurring and nonrecurring rates you contend BellSouth should charge e.spire for an unbundled DS-3 loop in Tennessee.

11. Produce all documents that support or refer or relate to the recurring and nonrecurring rates you contend BellSouth should charge e.spire for an unbundled OC3 loop in Tennessee.

12. Produce all documents that support or refer or relate to the recurring and nonrecurring rates you contend BellSouth should charge e.spire for an unbundled OC12 loop in Tennessee.

13. Produce all documents that support or refer or relate to the recurring and nonrecurring rates you contend BellSouth should charge e.spire for an unbundled OC48 loop in Tennessee.

14. Produce all documents that support or refer or relate to the recurring and nonrecurring rates you contend BellSouth should charge e.spire for dark fiber in Tennessee.

15. Produce all documents that support or refer or relate to the recurring and nonrecurring rates you contend BellSouth should charge e.spire for an unbundled "clean-copper" loop in Tennessee.

16. Produce all documents that refer or relate to the technical specifications or standards for unbundled "clean copper" loops.

17. Produce all documents that support or refer or relate to the recurring and nonrecurring rates you contend BellSouth should charge in Tennessee for providing cross connections to connect an unbundled local loop to e.spire's facilities.

18. Produce all documents that support or refer or relate to the recurring and nonrecurring rates you contend BellSouth should charge in Tennessee for providing channelization and/or multiplexing required to convert voice-grade unbundled loops to DS-1-level for connection with e.spire's point of interface.

19. Produce all documents that support or refer or relate to the recurring and nonrecurring rates you contend BellSouth should charge in Tennessee for local office transport and termination (including in-office switching, transport and tandem switching).

20. Produce all documents that support or refer or relate to the recurring and nonrecurring rates you contend BellSouth should charge e.spire for DS-3 interoffice transport facilities in Tennessee.

21. Produce all documents that support or refer or relate to the recurring and nonrecurring rates you contend BellSouth should charge e.spire for OC3 interoffice transport facilities in Tennessee.

22. Produce all documents that support or refer or relate to the recurring and nonrecurring rates you contend BellSouth should charge e.spire for OC12 interoffice transport facilities in Tennessee.

23. Produce all documents that support or refer or relate to the recurring and nonrecurring rates you contend BellSouth should charge e.spire for OC48 interoffice transport facilities in Tennessee.

24. Produce all documents that support or refer or relate to the recurring and nonrecurring rates you contend BellSouth should charge e.spire for frame relay elements necessary to provide packet-switched services in Tennessee, including the User-to-End Network Interface, Network-to-Network Interface, and the Data Link Control Identifiers and Committed Information Rates.

25. Produce all documents that support or refer or relate to the activities you contend are required for BellSouth to provide e.spire with an unbundled loop to serve an existing BellSouth customer who has elected to switch its local service to e.spire.

26. Produce all documents that support or refer or relate to the activities you contend are required for BellSouth to provide e.spire with an unbundled loop to establish service for a new customer who has chosen e.spire as its provider of local service.

27. Produce all documents that support or refer or relate to e.spire's proposed loop provisioning intervals as set forth in the Arbitration Petition.

28. Produce all documents that relate to the technical specifications or standards concerning a "Bit Stream UNE/Loop," as that term is used in Issue ATT2-8 of the Arbitration Petition.

29. Produce all documents that refer or relate to any request by e.spire to an Incumbent Local Exchange Carrier (other than BellSouth) to provide e.spire with an "Enhanced Extended Link" or "EEL" alternative, as well as all documents referring or relating to the Incumbent Local Exchange Carrier's response to any such request.

30. Produce a copy of any interim or final decision in an arbitration under Section 252 of the Act or in any other proceeding under the Act that addresses the issue

of whether e.spire should be provided with an “Enhanced Extended Link” or “EEL” alternative.

31. Produce all documents that refer or relate to any request by e.spire to an Incumbent Local Exchange Carrier (other than BellSouth) to provide e.spire with volume and term discounts on unbundled network elements consistent with those available for the Incumbent’s special access services.

32. Produce a copy of any interim or final decision in an arbitration under Section 252 of the Act or in any other proceeding under the Act that addresses the issue of whether e.spire should receive volume and term discounts on unbundled network elements from an Incumbent Local Exchange Carrier consistent with those available for the Incumbent’s special access services.

33. Produce all documents that refer or relate to any request by e.spire to an Incumbent Local Exchange Carrier (other than BellSouth) to charge e.spire rates for unbundled loops that are deaveraged on a geographical basis.

34. Produce a copy of any interim or final decision in an arbitration under Section 252 of the Act or in any other proceeding under the Act that addresses the issue of whether e.spire should receive rates for unbundled loops that are deaveraged on a geographical basis.

35. Produce all documents that refer or relate to any request by e.spire to an Incumbent Local Exchange Carrier (other than BellSouth) to permit e.spire to convert its special access facilities to “Extended Link UNEs,” as that term is used in Issue ATT2-29(a) of the Arbitration Petition.

36. Produce a copy of any interim or final decision in an arbitration under Section 252 of the Act or in any other proceeding under the Act that addresses the issue of whether e.spire should be permitted to convert its special access facilities to “Extended Link UNEs,” as that term is used in Issue ATT2-29(a) of the Arbitration Petition.

37. Produce all documents that refer or relate to any request by e.spire to an Incumbent Local Exchange Carrier (other than BellSouth) to permit e.spire to sublease its existing and future physical collocation space to third-party telecommunications carriers.

38. Produce a copy of any interim or final decision in an arbitration under Section 252 of the Act or in any other proceeding under the Act that addresses the issue of whether e.spire should be permitted to sublease its existing and future physical collocation space to third-party telecommunications carriers.

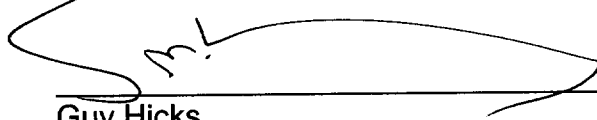
39. Produce all documents that support or refer or relate to the recurring and nonrecurring rates you contend BellSouth should charge for physical collocation in Tennessee, including cross-connects.

40. Produce all documents that support or refer or relate to the factor e.spire contends should be applied to the square footage leased by e.spire for collocation to compensate BellSouth for use of common areas.

41. Produce all documents that support or refer or relate to e.spire’s proposed Firm Order Confirmation (“FOC”) intervals as set forth in the Arbitration Petition.

Respectfully submitted,

BELLSOUTH TELECOMMUNICATIONS, INC.

A handwritten signature in black ink, appearing to be "Guy Hicks", written over a horizontal line.

Guy Hicks
Suite 2101
333 Commerce Street
Nashville, Tennessee 37201
(615) 214-6301

William J. Ellenberg II
Thomas B. Alexander
Bennett L. Ross
Suite 4300, BellSouth Center
675 W. Peachtree Street, N.E.
Atlanta, GA 30375
(404) 335-0711

153547

CERTIFICATE OF SERVICE

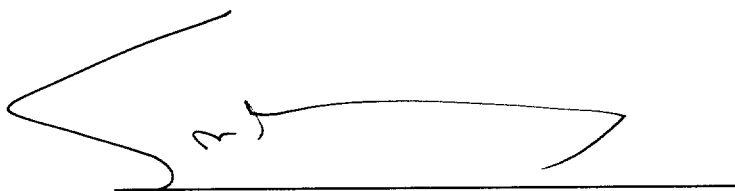
I hereby certify that on March 1, 1999, a copy of the foregoing document was served on the parties of record, via hand delivery or U.S. Mail, postage-prepaid, addressed as follows:

Richard Collier, Esquire
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0500

Henry Walker, Esquire
Boult, Cummings, et al.
414 Union Street, #1600
P. O. Box 198062
Nashville, TN 37219-8062

Brad E. Mutschelknaus
Kelley Drye & Warren LLP
1200 Nineteenth Street N.W., Suite 500
Washington, D.C. 20036

Riley M. Murphy
James C. Falvey
E.Spire Communications, Inc.
122 National Business Parkway
Suite 200
Annapolis Junction, Maryland 20701

A handwritten signature in black ink, appearing to read "Riley M. Murphy", is written over a horizontal line.

**BEFORE THE TENNESSEE REGULATORY AUTHORITY
Nashville, Tennessee**

In Re: *Petition by e.spire Communications, Inc. and American Communication Services of Nashville, Inc. for Arbitration with BellSouth Telecommunications, Inc., Pursuant to the Telecommunications Act of 1996*

Docket No. 98-00834

**BELLSOUTH TELECOMMUNICATIONS, INC.'S
FIRST INTERROGATORIES TO
e.spire COMMUNICATIONS, INC.**

BellSouth Telecommunications, Inc. ("BellSouth") hereby requests e.spire Communications, Inc. ("e.spire") to provide answers in response to the following Interrogatories by April 1, 1999.

INSTRUCTIONS

(a) If any response required by way of answer to these Interrogatories is considered to contain confidential or protected information, please furnish this information subject to a protective agreement.

(b) If any response required by way of answer to these Interrogatories is withheld under a claim of privilege, please identify the privilege asserted and describe the basis for such assertion.

(c) These Interrogatories are to be answered with reference to all information in your possession, custody or control or reasonably available to you.

(d) If any Interrogatory cannot be responded to in full, answer to the extent possible and specify the reason for your inability to respond fully. If you object to any part

of an Interrogatory, answer all parts of the Interrogatory to which you do not object, and as to each part to which you do object, separately set forth the specific basis for the objection.

(e) These Interrogatories are continuing in nature and require supplemental responses should information unknown to you at the time you serve your responses to these Interrogatories subsequently become known or should your initial response be incorrect or untrue.

DEFINITIONS

(a) "e.spire" means e.spire Communications, Inc., American Communication Services of Nashville, Inc., any predecessors in interest, its parent, subsidiaries, and affiliates, their present and former officers, employees, agents, directors, and all other persons acting or purporting to act on behalf of e.spire.

(b) "You" and "your" refer to e.spire.

(c) "Person" means any natural person, corporation, corporate division, partnership, other unincorporated association, trust, government agency, or entity.

(d) "And" and "or" shall be construed both conjunctively and disjunctively, and each shall include the other whenever such construction will serve to bring within the scope of these Interrogatories information that would not otherwise be brought within their scope.

(e) "Identification" or "identify" when used in reference to: (i) a natural individual, requires you to state his or her full name and residential and business address; (ii) a corporation, requires you to state its full corporate name and any names under which it does business, the state of incorporation, and the address of its principal place of business; (iii) a document, requires you to state the number of pages and the nature of the document (e.g., a letter or memorandum), its title, its date, the name or names of its authors and recipients, and

its present location or custodian; (iv) a communication, requires you, if any part of the communication was written, to identify the document or documents which refer to or evidence the communication, and to the extent that the communication was not written, to identify the persons participating in the communication and to state the date, manner, place, and substance of the communication.

(f) "Arbitration Petition" refers to the petition filed by e.spire on November 25, 1998 requesting arbitration under Section 252(b) of the Communications Act of 1934, as amended by the Telecommunications Act of 1996 ("Act").

(g) "Incumbent Local Exchange Carrier" refers to the term as defined in Section 252(h) of the Act, as codified in 47 U.S.C. § 252(h).

INTERROGATORIES

1. Identify all persons participating in the preparation of the answers to these Interrogatories or supplying information used in connection therewith.

RESPONSE:

2. Identify each person whom you expect to call as an expert witness at the arbitration hearing. With respect to each such expert, please state the subject matter on which the expert is expected to testify, the substance of the facts and opinions to which the expert is expected to testify, and a summary of the grounds for each opinion.

RESPONSE:

3. Identify each person whom you have consulted as an expert in anticipation of this arbitration or in preparation for a hearing in this arbitration who is not expected to be called as a witness. With respect to each such expert, please state the facts known by and opinions held by this expert concerning any matters raised in the Arbitration Petition.

RESPONSE:

4. Identify all documents which refer or relate to any issues raised in the Arbitration Petition that were provided or made available to any expert identified in response to Interrogatory Nos. 2 or 3.

RESPONSE:

5. State the recurring and nonrecurring rates you contend BellSouth should charge e.spire for an unbundled 2-wire voice grade loop in Tennessee. In answering this Interrogatory, please describe with particularity the method by which these rates were calculated.

RESPONSE:

6. State the recurring and nonrecurring rates you contend BellSouth should charge e.spire for an unbundled 4-wire voice grade loop in Tennessee. In answering this

Interrogatory, please describe with particularity the method by which these rates were calculated.

RESPONSE:

7. State the recurring and nonrecurring rates you contend BellSouth should charge e.spire for an unbundled 2-wire ISDN digital grade loop in Tennessee. In answering this Interrogatory, please describe with particularity the method by which these rates were calculated.

RESPONSE:

8. State the recurring and nonrecurring rates you contend BellSouth should charge e.spire for an unbundled 2-wire ADSL-compatible loop in Tennessee. In answering this Interrogatory, please describe with particularity the method by which these rates were calculated.

RESPONSE:

9. State the recurring and nonrecurring rates you contend BellSouth should charge e.spire for an unbundled 2-wire HDSL-compatible loop in Tennessee. In answering this Interrogatory, please describe with particularity the method by which these rates were calculated.

RESPONSE:

10. State the recurring and nonrecurring rates you contend BellSouth should charge e.spire for an unbundled 4-wire HDSL-compatible loop in Tennessee. In answering this Interrogatory, please describe with particularity the method by which these rates were calculated.

RESPONSE:

11. State the recurring and nonrecurring rates you contend BellSouth should charge e.spire for an unbundled 4-wire DS1 digital grade loop in Tennessee. In answering this Interrogatory, please describe with particularity the method by which these rates were calculated.

RESPONSE:

12. State the recurring and nonrecurring rates you contend BellSouth should charge e.spire for an unbundled 4-wire 56/64 kbps digital grade loop in Tennessee. In answering this Interrogatory, please describe with particularity the method by which these rates were calculated.

RESPONSE:

13. State the recurring and nonrecurring rates you contend BellSouth should charge e.spire for an unbundled DS-3 loop in Tennessee. In answering this Interrogatory, please describe with particularity the method by which these rates were calculated.

RESPONSE:

14. State the recurring and nonrecurring rates you contend BellSouth should charge e.spire for an unbundled OC3 loop in Tennessee. In answering this Interrogatory, please describe with particularity the method by which these rates were calculated.

RESPONSE:

15. State the recurring and nonrecurring rates you contend BellSouth should charge e.spire for an unbundled OC12 loop in Tennessee. In answering this Interrogatory, please describe with particularity the method by which these rates were calculated.

RESPONSE:

16. State the recurring and nonrecurring rates you contend BellSouth should charge e.spire for an unbundled OC48 loop in Tennessee. In answering this Interrogatory, please describe with particularity the method by which these rates were calculated.

RESPONSE:

17. State the recurring and nonrecurring rates you contend BellSouth should charge e.spire for dark fiber in Tennessee. In answering this Interrogatory, please describe with particularity the method by which these rates were calculated.

RESPONSE:

18. State the recurring and nonrecurring rates you contend BellSouth should charge e.spire for an unbundled "clean copper" loop in Tennessee. In answering this Interrogatory, please describe with particularity:

- (a) the method by which these rates were calculated; and
- (b) the technical specifications or standards for an unbundled "clean copper" loop.

RESPONSE:

19. State the recurring and nonrecurring rates you contend BellSouth should charge in Tennessee for providing cross connections to connect an unbundled local loop to e.spire's facilities. In answering this Interrogatory, please describe with particularity the method by which these rates were calculated.

RESPONSE:

20. State the recurring and nonrecurring rates you contend BellSouth should charge in Tennessee for providing channelization and/or multiplexing required to convert voice-grade unbundled loops to DS1-level for connection with e.spire's point of interface. In answering this Interrogatory, please describe with particularity the method by which these rates were calculated.

RESPONSE:

21. State the recurring and nonrecurring rates you contend BellSouth should charge in Tennessee for local office transport and termination (including end office switching, transport and tandem switching). In answering this Interrogatory, please describe with particularity the method by which these rates were calculated.

RESPONSE:

22. State the recurring and nonrecurring rates you contend BellSouth should charge e.spire for DS-3 interoffice transport facilities in Tennessee. In answering this Interrogatory, please describe with particularity the method by which these rates were calculated.

RESPONSE:

23. State the recurring and nonrecurring rates you contend BellSouth should charge e.spire for OC3 interoffice transport facilities in Tennessee. In answering this Interrogatory, please describe with particularity the method by which these rates were calculated.

RESPONSE:

24. State the recurring and nonrecurring rates you contend BellSouth should charge e.spire for OC12 interoffice transport facilities in Tennessee. In answering this Interrogatory, please describe with particularity the method by which these rates were calculated.

RESPONSE:

25. State the recurring and nonrecurring rates you contend BellSouth should charge e.spire for OC48 interoffice transport facilities in Tennessee. In answering this Interrogatory, please describe with particularity the method by which these rates were calculated.

RESPONSE:

26. State the recurring and nonrecurring rates you contend BellSouth should charge in Tennessee for the frame relay elements necessary to provide packet-switch

services, including the User-to-End Network Interface, Network-to-Network Interface, and the Data Link Control Identifiers and Committed Information Rates. In answering this Interrogatory, please describe with particularity the method by which these rates were calculated.

RESPONSE:

27. Identify all studies, evaluations, reports, or analyses prepared by or for e.spire since January 1, 1996 that refer or relate to the cost to BellSouth or any other Incumbent Local Exchange Carrier of providing any of the unbundled network elements or other services requested by e.spire in its Arbitration Petition.

RESPONSE:

28. Please explain in detail what activities you contend are required for BellSouth to provide e.spire with an unbundled loop to serve an existing BellSouth customer who has elected to switch its local service to e.spire. In answering this Interrogatory, please describe with particularity:

- (a) the basis for your explanation, including identifying any studies, evaluations, reports, or analyses upon which your explanation is based; and
- (b) any differences in these activities depending upon the type of unbundled loop that is being provided.

RESPONSE:

29. Please explain in detail what activities you contend are required for BellSouth to provide e.spire with an unbundled loop to establish service for a new customer who has chosen e.spire as its provider of local service. In answering this Interrogatory, please describe with particularity:

- (a) the basis for your explanation, including identifying any studies, evaluations, reports, or analyses upon which your explanation is based; and
- (b) any differences in these activities depending upon the type of unbundled loop that is being provided.

RESPONSE:

30. Have studies, evaluations, reports, or analyses been prepared by or on behalf of e.spire relating to spectrum management? If the answer is in the affirmative, please identify such studies, evaluations, reports, or analyses, as well as all documents referring or relating thereto.

RESPONSE:

31. Are there any types of unbundled loops that you have requested from BellSouth that you contend BellSouth has refused to provide on an unbundled basis? If the answer is in the affirmative, please:

- (a) identify with particularity the type of unbundled loop you requested which BellSouth allegedly has refused to provide;
- (b) state the date when you first requested the unbundled loop and the date BellSouth allegedly refused to provide it;
- (c) state the reasons purportedly given by BellSouth for its refusal to provide such unbundled loop; and
- (d) identify all documents that refer or relate to e.spire's request for or BellSouth's refusal to provide each such unbundled loop.

RESPONSE:

32. Are there any types of frame relay elements necessary to provide packet-switched services that you have requested from BellSouth that you contend BellSouth has refused to provide on an unbundled basis? If the answer is in the affirmative, please:

- (a) identify with particularity the type of element you requested which BellSouth allegedly has refused to provide;
- (b) state the date when you first requested the element and the date BellSouth allegedly refused to provide it;
- (c) state the reasons purportedly given by BellSouth for its refusal to provide element; and

- (d) identify all documents that refer or relate to e.spire's request for or BellSouth's refusal to provide each such element.

RESPONSE:

33. Describe with particularity the technical specifications or standards concerning a "Bit Stream UNE/Loop," as that term is used in Issue ATT2-8 of the Arbitration Petition.

RESPONSE:

34. Identify all states in which e.spire has requested an Incumbent Local Exchange Carrier (other than BellSouth) to provide e.spire with an "Enhanced Extended Link" or "EEL" alternative. In answering this Interrogatory, please:

- (a) identify the Incumbent Local Exchange Carrier to whom the request was made;
- (b) state the date of e.spire's request and the date of the Incumbent Local Exchange Carrier's response; and
- (c) describe with particularity the Incumbent Local Exchange Carrier's response to e.spire's request.

RESPONSE:

35. Identify all proceedings conducted under the Act, including, but not limited to, arbitrations under Section 252 of the Act, in which e.spire has sought to require that an Incumbent Local Exchange Carrier (other than BellSouth) provide e.spire with an “Enhanced Extended Link” or “EEL” alternative. In answering this Interrogatory, please:

- (a) identify the jurisdiction in which the proceeding was conducted, describe the nature of the proceeding, and state the docket number assigned to the proceeding; and
- (b) state the dates when the proceeding was initiated and when it was concluded, if applicable.

RESPONSE:

36. Identify all states in which e.spire has requested an Incumbent Local Exchange Carrier (other than BellSouth) to provide e.spire with volume and term discounts on unbundled network elements consistent with those available for the Incumbent’s special access services. In answering this Interrogatory, please:

- (a) identify each Incumbent Local Exchange Carrier to whom such a request was made;
- (b) state the date of e.spire’s request and the date of the Incumbent Local Exchange Carrier’s response; and
- (c) describe with particularity the Incumbent Local Exchange Carrier’s response to e.spire’s request, including the discounts to which the incumbent agreed, if any.

RESPONSE:

37. Identify all proceedings conducted under the Act, including, but not limited to, arbitrations under Section 252 of the Act, in which e.spire has sought to require that an Incumbent Local Exchange Carrier (other than BellSouth) provide volume and term discounts on unbundled network elements purchased from that Incumbent. In answering this Interrogatory, please:

- (a) identify the jurisdiction in which the proceeding was conducted, describe the nature of the proceeding, and state the docket number assigned to the proceeding; and
- (b) state the dates the proceeding was initiated and when it was concluded, if applicable.

RESPONSE:

38. State with particularity the terms and conditions of any volume and term discounts you contend BellSouth should provide e.spire for the purchase of unbundled network elements or resold services. In answering this Interrogatory, please:

- (a) state all facts that support or refer or relate to the adoption of such terms and conditions; and
- (b) identify all documents that support or refer or relate to the adoption of such terms and conditions.

RESPONSE:

39. Identify all states in which e.spire has requested that an Incumbent Local Exchange Carrier (other than BellSouth) charge e.spire rates for unbundled loops that are deaveraged on a geographical basis. In answering this Interrogatory, please:

- (a) identify each Incumbent Local Exchange Carrier to whom such a request was made;
- (b) state the date of e.spire's request and the date of the Incumbent Local Exchange Carrier's response; and
- (c) describe with particularity the Incumbent Local Exchange Carrier's response to e.spire's request, including the geographically deaveraged rates to which the incumbent agreed, if any.

RESPONSE:

40. Identify all proceedings conducted under the Act, including, but not limited to, arbitrations under Section 252 of the Act, in which e.spire has sought to require that an Incumbent Local Exchange Carrier (other than BellSouth) provide geographically deaveraged loop rates. In answering this Interrogatory, please:

- (a) identify the jurisdiction in which the proceeding was conducted, describe the nature of the proceeding, and state the docket number assigned to the proceeding; and

- (b) state the date the proceeding was initiated and when it was concluded, if applicable.

RESPONSE:

41. Identify all states in which e.spire has requested that an Incumbent Local Exchange Carrier (other than BellSouth) permit e.spire to convert its special access facilities to "Extended Link UNEs", as that term is used in Issue ATT2-29(a) of the Arbitration Petition. In answering this Interrogatory, please:

- (a) identify each Incumbent Local Exchange Carrier to whom such a request was made;
- (b) state the date of e.spire's request and the date of the Incumbent Local Exchange Carrier's response; and
- (c) describe with particularity the incumbent Local Exchange Carrier's response to e.spire's request, including the terms of the network conversion to which the incumbent agreed, if any.

RESPONSE:

42. Identify all proceedings conducted under the Act, including, but not limited to, arbitrations under Section 252 of the Act, in which e.spire has sought to require that an Incumbent Local Exchange Carrier (other than BellSouth) allow e.spire to convert its special access facilities to "Extended Link UNEs." In answering this Interrogatory, please:

- (a) identify the jurisdiction in which the proceeding was conducted, describe the nature of the proceeding, and state the docket number assigned to the proceeding; and
- (b) state the dates when the proceeding was initiated and when it was concluded, if applicable.

RESPONSE:

43. Identify all states in which e.spire has requested that an Incumbent Local Exchange Carrier (other than BellSouth) allow e.spire to sublease its existing and future physical collocation space to third party telecommunications carriers. In answering this Interrogatory, please:

- (a) identify each Incumbent Local Exchange Carrier to whom such a request was made;
- (b) state the date of e.spire's request and the date of the Incumbent Local Exchange Carrier's response; and
- (c) describe with particularity the incumbent Local Exchange Carrier's response to e.spire's request, including the terms of any subleasing arrangement to which the incumbent agreed, if any.

RESPONSE:

44. Identify all proceedings conducted under the Act, including, but not limited to, arbitrations under Section 252 of the Act, in which e.spire has sought to require that an Incumbent Local Exchange Carrier (other than BellSouth) allow e.spire to sublease its existing and future physical collocation space leased from that Incumbent. In answering this Interrogatory, please:

- (a) identify the jurisdiction in which the proceeding was conducted, describe the nature of the proceeding, and state the docket number assigned to the proceeding; and
- (b) state the dates when the proceeding was initiated and when it was concluded, if applicable.

RESPONSE:

45. Identify all states in which e.spire is providing local exchange service and identify the number of access lines being served by e.spire in each such state.

RESPONSE:

46. Identify the location of each physical collocation space leased by e.spire from any Incumbent Local Exchange Carrier, including BellSouth. In answering this Interrogatory, please:

- (a) identify the Incumbent Local Exchange Carrier from which e.spire is leasing each such physical collocation space;

- (b) state with particularity all costs incurred by e.spire in connection with leasing each such physical collocation space, including identifying all recurring and nonrecurring costs charged by the incumbent for e.spire's use of that space; and
- (c) state the interval in which each such physical collocation space was provided, including identifying all dates used to determine this interval (i.e., the date of e.spire's request for the collocation space and the date the space was made available).

RESPONSE:

47. State the recurring and nonrecurring rates you contend BellSouth should charge for physical collocation in Tennessee, including cross-connects. In answering this Interrogatory, please describe with particularity the method by which these rates were calculated.

RESPONSE:

48. Identify all studies, evaluations, reports, analyses, or other documents prepared by or for e.spire since January 1, 1996 that refer or relate to the out-of-service time for e.spire's end-users when any Incumbent Local Exchange Carrier, including BellSouth, provisions an unbundled loop to e.spire.

RESPONSE:

49. Identify all studies, evaluations, reports, analyses, or other documents prepared by or for e.spire since January 1, 1996 that refer or relate to the out-of-service time for e.spire's end-users when any incumbent Local Exchange Carrier, including BellSouth, provisions multiple unbundled loops to e.spire.

RESPONSE:

50. Identify all studies, evaluations, reports, analyses, or other documents prepared by or for e.spire since January 1, 1996 that refer or relate to the time in which e.spire receives a Firm Order Confirmation ("FOC") from any Incumbent Local Exchange Carrier, including BellSouth.

RESPONSE:

51. Do you contend that the work involved in BellSouth's cutting over an unbundled loop to allow e.spire to serve one of its end user customers is analogous to the work involved in BellSouth turning up service to one of its end user customers? If the answer is in the affirmative, please:

- (a) state all facts which support this contention, including describing with particularity all work activities that you contend are involved; and
- (b) identify all documents which support this contention.

RESPONSE:

52. Have BellSouth and e.spire reached agreement for frame relay service interconnection? If the answer is in the negative, identify all aspects of such interconnection as proposed by e.spire to which BellSouth has not agreed, including, but not limited to, network architecture and pricing, and explain in detail the basis for each of e.spire's proposals.

RESPONSE:

53. What are the current costs to e.spire of transporting and terminating local traffic in BellSouth's region? In answering this interrogatory, identify all documents that support or refer or relate to the calculation of such costs.

RESPONSE:

54. What would be the cost to e.spire of transporting and terminating local traffic in BellSouth's region assuming the costs of an efficiently configured and operated system of a competing local service provider? In answering this interrogatory, identify all documents that support or refer or relate to the calculation of such costs.

RESPONSE:

55. Do you contend that BellSouth has made network elements or services available to e.spire on terms less favorable than those BellSouth makes available to any BellSouth affiliate or other telecommunications carrier? If the answer to the interrogatory is in the affirmative, please state all facts and identify all documents which support this contention.

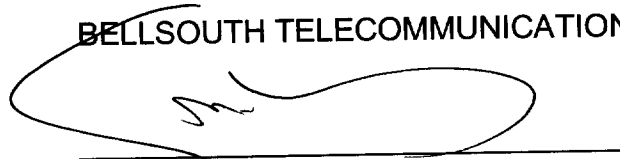
RESPONSE:

56. Describe in detail e.spire's proposal that BellSouth establish "help desk" coverage for inquiries relating to the electronic interfaces for ordering and provisioning, as set forth in Issue ATT6-20 of the Arbitration Petition. In answering this interrogatory, describe with particularity the types of inquiries e.spire would expect the "help desk" to be able to answer and explain how e.spire proposes BellSouth should be able to recover the costs associated with establishing and maintaining such a "help desk."

RESPONSE:

Respectfully submitted,

BELLSOUTH TELECOMMUNICATIONS, INC.

A handwritten signature in black ink, appearing to read "Guy Hicks", is written over a horizontal line.

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153529

CERTIFICATE OF SERVICE

I hereby certify that on March 1, 1999, a copy of the foregoing document was served on the parties of record, via hand delivery or U.S. Mail, postage-prepaid, addressed as follows:

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